

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AUBREY DRAKE GRAHAM,

Plaintiff,

v.

UMG RECORDINGS, INC.,

Defendant.

No. 1:25-cv-399-JAV

**NOTICE OF MOTION AND
MOTION TO DISMISS**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 12(b)(6), and upon the accompanying Memorandum of Law, Request for Judicial Notice, and Declaration of Rollin A. Ransom, Defendant UMG Recordings, Inc. respectfully moves this Court, before the Honorable Jeannette A. Vargas, U.S.D.J., at the United States Courthouse for the Southern District of New York located at 500 Pearl Street, New York, NY 10007, for an order dismissing the Complaint for failure to state a claim.

Dated: March 17, 2025

/s/ Rollin A. Ransom

Rollin A. Ransom (admitted *pro hac vice*)

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